

1 THE HONORABLE BARBARA JACOBS ROTHSTEIN
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 TATIANA WESTBROOK, an individual;
11 JAMES WESTBROOK, an individual; HALO
12 BEAUTY PARTNERS, LLC, a Nevada Limited
13 Liability Company,

14 NO. 2:20-cv-01606-BJR

15 Plaintiffs,

16 **DECLARATION OF KIM FULMER**

17 v.

18 KATIE JOY PAULSON, an individual;
19 WITHOUT A CRYSTAL BALL, LLC, a
20 Minnesota Limited Liability Company; and
21 DOES 1 through 100, inclusive,

22 Defendants.

23 I, Kim Fulmer, hereby state as follows:

24 1. I am over the age of eighteen and am competent to testify to the facts alleged
25 herein.

26 2. I am a resident of North Carolina.

3. I was a moderator for the live stream of one of Katie Joy Paulson's YouTube
27 channel, "Without a Crystal Ball," from in or around July 2019 through in or around August
28 2019.

1 4. I became a moderator for Ms. Paulson after being a subscriber to her YouTube
2 channel for about a month, starting in or around June 2019.
3

4 5. Ms. Paulson reached out to me for help moderating her YouTube livestream after
I had interacted with her as a subscriber.
5

6 6. Part of my duties as a moderator was to delete negative comments written
regarding Ms. Paulson in the live stream chat boxes.
7

8 7. In addition to moderating for Ms. Paulson I also have my own YouTube channel
called “Unveiling the Mask.” I also have a Twitter account with the username @unveiling_.
9

10 8. In around August 2019, I had a falling out with Ms. Paulson, and she blocked me
as a moderator.
11

12 9. After I stopped moderating for Ms. Paulson, another subscriber and supporter of
Ms. Paulson’s YouTube channel and Twitter page, “Without a Crystal Ball,” and
@woacbofficial respectively, who I know to be Lori Ann Barnhart (Twitter usernames Lori Ann
/ @bloodtall and @lab05059) threatened multiple individuals, including myself, with violence
on Twitter. Specifically, because of my falling out with Ms. Paulson, Lori Ann Barnhart made
threats against me and threatened to have me murdered by a biker gang. Below are actual
screenshots from May 2020 that I obtained from my Twitter account that contain Ms. Barnhart’s
public threats of violence against myself and others.
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Lori Ann @lab05059 · 6h

@UNIRockTV I have Facebook friends that are also my twitter friends who can verify who I am and who my family is. So if Steve Mcrae thinks he can continue harassing me there my family will protect me and they are all over the US.



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Lori Ann @Bloodtall · 10h

Please share if you feel inclined to do so. I myself along with several others have been targeted by these people for defending Katie. I've made it clear that if they continue to harass me they will have consequences one way or another.

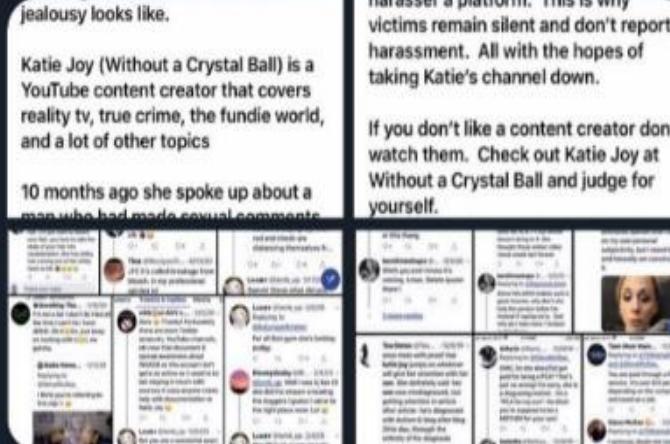
jealousy looks like.

Katie Joy (Without a Crystal Ball) is a YouTube content creator that covers reality tv, true crime, the fundie world, and a lot of other topics

10 months ago she spoke up about a man who had made sexual comments

harasser a platform. This is why victims remain silent and don't report harassment. All with the hopes of taking Katie's channel down.

If you don't like a content creator don't watch them. Check out Katie Joy at Without a Crystal Ball and judge for yourself.



3 1 7

Lori Ann
@Bloodtall

1 Thread 5/1/20

2 Katie supporters are banned.

3

4  Lori Ann @lab05059 · 7h

5 "Michelle" is kim from Unveiling
6 the mask" I will give anyone my
7 address. Come for me. I have
8 relatives that have spent time in
9 prison who protect their own and
10 are not afraid of going back to
11 prison. I know who the people
12 are behind this hate campaign.

13  Lori Ann @lab05059 · 7h

14

15  Michonne Capone · 2 minutes ago

16 Don't lock up now, let the others
17 see. Idc though because I'm already
18 following you 😊😊😊😊

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10. After receiving the threats of violence, I personally conducted an investigation and determined that Ms. Barnhart is a resident of the State of Washington, and that she works for the Office of the Secretary of Transportation for the State of Washington. Here is a link to the Washington Office of the Secretary of Transportation, which lists Ms. Barnhart as “Capital Projects and Business Services Planner” <https://wsdot.wa.gov/sites/default/files/2020/03/27/PT->

PhoneDirectory-WashingtonStatePublicTransportation.pdf. A redacted screenshot from this webpage, as it existed on December 18, 2020 is below :

WSDOT Office of the Secretary of Transportation

PO Box 47316
Olympia, WA 98504-7316
360-705-7054
Fax: 360-705-6800
Website: www.wsdot.wa.gov

Location:
310 Maple Park Ave., SE
Olympia, WA 98501-2348

| Position | Name | Phone | Email |
|-------------------------------|------|-------|-------|
| Secretary of Transportation | | | |
| Executive Asst to Secretary | | | |
| Deputy Secretary | | | |
| Executive Asst to Deputy Sec. | | | |
| Front Desk Receptionist | | | |

WSDOT Public Transportation Division

PO Box 47387
Olympia, WA 98504-7387
Fax: 360-705-6820
Website: www.wsdot.wa.gov/transit

Olympia Location:
310 Maple Park Ave. SE
Olympia, WA 98501-7387

Seattle Location:
401 2nd Ave. S., Suite 300
Seattle, WA 98104-3850

| Position | Name | Phone | Email |
|-----------------------------------|---------------|--------------|----------------------|
| Director | | | |
| Assistant Director | | | |
| Executive Assistant (Director) | | | |
| Administrative Assistant | | | |
| Asset Management | | | |
| Business Analyst | | | |
| Business Analyst | | | |
| Business Planner/Fiscal Contracts | | | |
| Business Services Planner | | | |
| Capital Program Delivery and | | | |
| Business Services Manager | | | |
| Capital Programs and | | | |
| Federal Funds Analyst | | | |
| Capital Programs Planner | | | |
| Capital Projects and Business | | | |
| Services Planner | Lori Barnhart | 360-705-7874 | barnhal@wsdot.wa.gov |
| Capital Projects Planner | | | |
| Capital Projects Engineer | | | |
| Community Liaison | | | |
| Community Liaison Lead | | | |
| Data Analyst | | | |
| FTA Compliance Administrator | | | |

**DECLARATION OF KIM FULMER-6
(2:20-CV-01606-BJR)**

CARROLL, BIDDLE, & BILANKO, PLLC
1000 2nd Avenue, Suite 3100
Seattle, WA 98104

11. I have observed tweets from the @woacbofficial Twitter page, which is I am
 1 informed by Ms. Paulson herself that she operates. In certain tweets, Ms. Paulson has interacted
 2 with Ms. Lori Ann Barnhart, and vice versa. In one tweet, Ms. Paulson refers to an account that I
 3 believe belongs to Ms. Barnhart (Lori Ann/ @bloodtall) as one of her “fiercest and loyalist”
 4 supporters. Below are some screenshots of tweets that I obtained from my Twitter account:
 5



Kirsten Conway
 @LaFouRoux

8
 9 Replying to [@woacbofficial](#)

10 **You're amazing, Katie.** Such a
 11 strong person. I want to be like you
 12 when I grow up (even though I'm
 13 older than you...lol).

14
 15 5:55 PM · 7/9/20 · Twitter for Android

16 5 Likes



19 Katie Joy @woacbofficial · 7/9/20

20 Replying to [@LaFouRoux](#)

21 My fiercest and loyalist - next to
 22 [@Bloodtall](#) & [@ARealHousewife0](#) 😊



24 12. Below are screenshots of additional tweets that I obtained from my Twitter
 25 account showing a relationship between Lori Ann Barnhart (@Bloodtall) and Katie Joy Paulson
 26

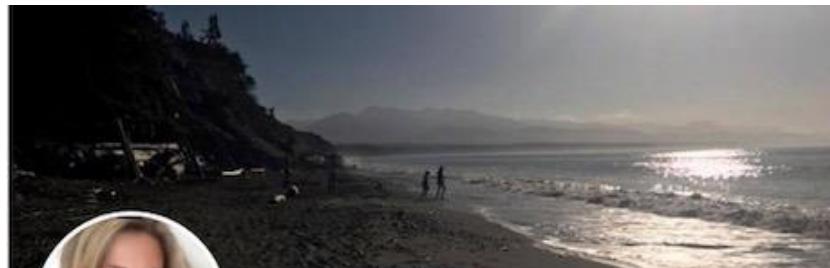
1 (@woacbofficial). The screenshot of the first tweet is from May 2020 and the second screenshot
 2 is from a tweet from November 6, 2020.

3  **Lori Ann** @Bloodtall · 10h
 4 Replying to [@Bloodtall](#)
 5 And Katie please know you have
 6 74k supporters we love you and
 7 your content! Thank you for
 8 being the bigger person in this
 9 and for always taking a stand for
 10 the victims.
 11    3 

12  **Lori Ann** @Bloodtall · 10h
 13 Replying to [@Bloodtall](#)
 14 And he is still at it. Trying to
 15 send his troll army after
 16 someone else. This is why
 17 victims don't speak out.
 18    1
 19  **Steve McRae** 😢📚👾💡 40m
 20 *Think one was Fancy... can't recall her*

21  **Katie Joy**
 22 @woacbofficial
 23 Lori Ann is a real person & you've
 24 targeted her causing her extreme
 25 and unwarranted harassment. My
 26 attorney sent you a letter
 27 yesterday explaining each ethics
 28 violations you are violating w/ this
 29 Twitter spectacle & further
 30 requested you cease contact with
 31 me! Stop 
 32 3:04 PM · 11/6/20 · Twitter for iPhone
 33 2 Quote Tweets 13 Likes

13. I have also obtained screenshots of other tweets from Lori Ann Barnhart's Twitter
 1 page @bloodtall wherein Ms. Barnhart publicly displays her support of Ms. Paulson in her page
 2 description and in her tweets. In a screenshot of one tweet from June 20, 2020, Ms. Barnhart
 3 defends Ms. Paulson against internet trolls – a subset of people that harass others on the internet:
 4



11 **Lori Ann**

12 @Bloodtall

13 Do I know you? 😊🍀🍀. without a Crystal Ball 111k
 subscribers!

14 ⚡ United States 📅 Joined November 2019

15 81 Following 36 Followers

16 Tweets

Tweets & replies

Media

Likes



18 Lori Ann @Bloodtall · 5h

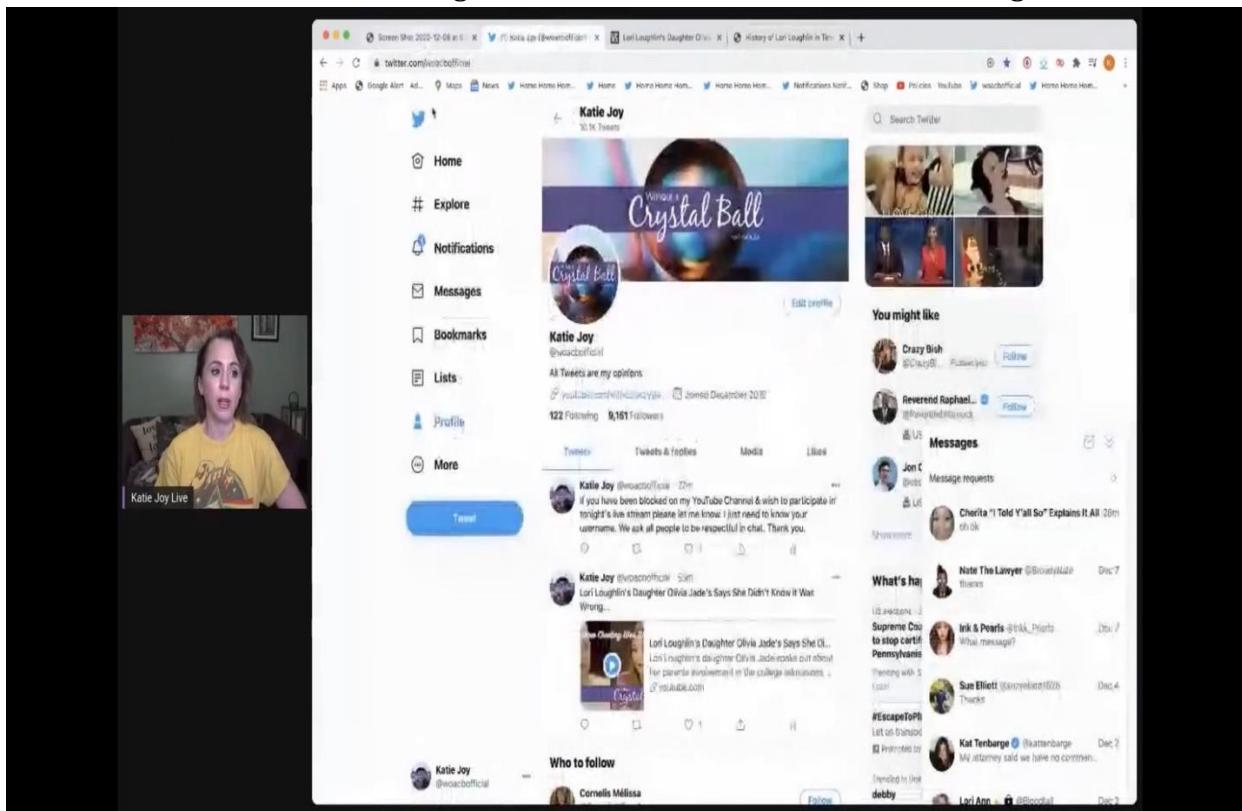
19 Replying to @LauraTheElf and
 @UNIRockTV

20 Yes the stupid worthless trolls that harass
 Katie need a life.



23 14. I have also observed a video published on December 8, 2020 on Ms. Paulson's
 24 YouTube channel named Without a Crystal Ball wherein Ms. Paulson is featured. The name of
 25 the video I viewed is "Lori Loughlin's Daughter Olivia Jade's Says She Didn't Know It Was
 26 Wrong to Cheat to Get Into USC," and can be found at <https://youtu.be/z97KQgkMWGQ>. Ms.

Paulson is seen in this video at the 12:51 time mark sharing her computer screen for all of her viewers to see. At the 12:51 time mark, Ms. Paulson shows all her viewers her Twitter page screen, which has a list of people with whom Ms. Paulson was communicating privately through Twitter's direct message feature. This direct message list that Ms. Paulson showed all of her viewers contains Ms. Barnhart's name and account on the bottom, and information showing that Ms. Paulson and Ms. Barnhart were conversing privately with one another as late as December 2, 2020. The following is a true and correct screenshot of the 12:51 time mark of the aforementioned video from Ms. Paulson's YouTube channel where in Ms. Paulson shows her Twitter computer direct message list, with Ms. Barnhart's direct message information disclosed at the bottom right corner:



15. In addition to Ms. Barnhart making threats involving violence, I was disturbed to discover in my investigation of Ms. Barnhart that she had criminal charges involving acts of

1 violence filed against her in the State of Washington. Based upon this discovery and the prior
2 threats that Ms. Barnhart has made against me personally and others generally, I have been, and
3 continue to be in reasonable fear for my and my family's personal safety, from both Ms.
4 Barnhart and Ms. Paulson, as it is my personal observation that Ms. Paulson intentionally
5 instructs, encourages, and/or condones Ms. Barnhart's harassment and intimidation of Ms.
6 Paulson's perceived enemies. Attached hereto as Exhibit "1" is a true and correct copy of
7 redacted charging documents against Lori Ann Barnhart from 2012 obtained from the Superior
8 Court of Washington Snohomish County, which are publicly on the Court's website at:
9 <https://snohomishcountywa.gov/197/Superior-Court>.

10
11 I declare under penalty of perjury under the laws of the United States of America that the
12 forgoing is true and correct.

13
14 SIGNED on December 19, 2020.

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17 Kim Fulmer
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EXHIBIT “1”

FILED

2012 JUL 27 AM 11:09

SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASH



SUPERIOR COURT OF WASHINGTON
FOR SNOHOMISH COUNTY

THE STATE OF WASH. STON,

Plaintiff,

No. 12-1-01609-1

v.

BARNHART, LORI ANN

SUMMONS

Defendant.

THE STATE OF WASHINGTON TO:

LORI ANN BARNHART

STANWOOD, WA

You are hereby charged with a criminal offense by Information on file in this court.

THEREFORE, in the name of the State of Washington, you are commanded to appear on AUGUST 13, 2012, at 3:00 PM, for Arraignment Hearing. Report to Room 304, 3rd Floor, Snohomish County Courthouse, 3000 Rockefeller Ave., Everett, Washington.

FAILURE TO APPEAR WILL RESULT IN A WARRANT BEING ISSUED FOR YOUR ARREST.

I hereby certify that I deposited in the United States mail a properly addressed envelope directed to the above name and address containing a copy of the attached information and this summons directing appearance in Superior Court on the above-mentioned date.

Sonya Kraski, Snohomish County Clerk and ex-officio Clerk of this Court.

By Dee MacLagan Deputy Clerk
Issued: JUL 19 2012



Name or ID# Dee MacLagan
DATED: 7-27-12

IF YOU WANT TO HAVE A LAWYER TO REPRESENT YOU IN THIS CASE, YOU SHOULD APPEAR IN COURT WITH YOUR LAWYER ON THE DATE INDICATED ABOVE. IF YOU CANNOT AFFORD A LAWYER AND BELIEVE YOU MAY BE ELIGIBLE FOR A LAWYER APPOINTED AT PUBLIC EXPENSE, YOU SHOULD AS SOON AS POSSIBLE, CONTACT THE DEPARTMENT OF ASSIGNED COUNSEL AT 3000 ROCKEFELLER RM C103, EVERETT, WASHINGTON AT (425-388-3500) 8:30 AM TO 11:45 AM AND 1:00 PM TO 4:00 PM. A \$10.00 SCREENING FEE WILL BE ASSESSED AT THE TIME YOUR ELIGIBILITY FOR APPOINTED COUNSEL IS DETERMINED. THAT FEE MAY BE WAIVED UNDER CERTAIN CIRCUMSTANCES. YOU SHOULD CONTACT YOUR LAWYER OR THE DEPARTMENT OF ASSIGNED COUNSEL AT LEAST 24 HOURS IN ADVANCE.

5